STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Z-TEL COMMUNICATIONS, INC.,	}	
Complainant,	} } } }	
vs.	} }	Docket No. 02-0160
ILLINOIS BELL TELEPHONE COMPANY, d/b/a AMERITECH ILLINOIS,	} } }	
Respondent.	} }	

Rebuttal Testimony on Rehearing of

Beth Lawson

Ameritech Illinois Exhibit 4.0

September 24, 2002

1   Introduction and purpose of testimony

2   Q.   Please state your name and business address.

3   A.   My name is Beth Lawson. I have changed office location since my initial

4   testimony. My business address is now 3 Bell Plaza, Room 1431, Dallas,

5   Texas 75202.

6   Q.   Did you present direct testimony in this rehearing proceeding?

7   A.   Yes, my direct testimony, Ameritech Illinois Exhibit 3.0, was served on

8   July 26, 2002.

9   Q.   What is the purpose of your rebuttal testimony?

10   A.   The purpose of my rebuttal testimony is to respond to statements made by

11   Z-Tel witness Michael Reith in testimony served on September 16, 2002,

12   and statements made by Staff witness Nancy B. Weber in testimony

13   served on September 19, 2002.

14   Response to testimony of Michael Reith

15   Q.   What position does Z-Tel take with respect to Ameritech Illinois' rehearing

16   request that the Commission eliminate from its Final Order the

17   requirement to provide the Local Loss Report?

18   A.   Mr. Reith states (page 2, line 9) that Z-Tel opposes Ameritech's request

19   unless Ameritech provides the same information and more on the 836

20   LLN. On page 6 of his testimony, Mr. Reith acknowledges that Z-Tel has

21   not used the Local Loss Report.

22   Q.   What action does Z-Tel request the Commission to take in this rehearing

23   proceeding?

24   A.   Mr. Reith states (page 2, line 14) that "in order to achieve parity in the

25   provision of OSS information on lost customers," Ameritech should be

26   required to provide Z-Tel with a revised 836 line loss notification that

27   contains six categories of information, rather than just the two categories

28   of information on the current LSOG 5 version of the 836 LLN. In effect, Z-

29   Tel is asking the Commission to redesign the 836 LLN in this rehearing

30   proceeding.

31   Q.   Should the Commission consider Z-Tel's request in this rehearing

32   proceeding?

33   A.   No. In its September 23, 1999 Order in ICC Docket No. 98-0555, the

34   Commission approved the SBC-Ameritech merger subject to certain

35   conditions. One of those conditions—Condition 29—required

36   SBC/Ameritech to implement a comprehensive plan for improving the

37   OSS systems and interfaces available to CLECs in Illinois. The FCC's

38   Order approving the merger, *In re* Applications of Ameritech Corporation

39   and SBC Communications, Inc. for Consent to Transfer Control of

40   Corporations Holding Commission Licenses and Lines Pursuant to

41   Sections 214 and 310(d) of the Communications Act, CC Docket NO. 98-

42   141 (FCC 99-279 released October 8, 1999), also directed SBC-

43   Ameritech to develop and implement uniform and enhanced OSS

44   interfaces. Both Condition 29 and the FCC Conditions directed SBC-

45   Ameritech to work collaboratively with CLECs to identify best practices in

46   the 13-state SBC region and required enhancements to operations

47   support systems (OSS) and OSS application-to-application and graphical

48   user (GUI) interfaces, including line loss notifications. SBC-Ameritech

49   was required to develop and implement the uniform and enhanced OSS

50   and OSS interfaces agreed upon in the collaborative process within an

51   established time frame. The end product of these collaborative

52   processes—the Uniform and Enhanced OSS Plan of Record was fully

53   implemented in Illinois in April 2002, with prior interim steps.

54   The CLECs agreed during the collaborative process that the 836

55   LLN was the form of line loss notification called for by the industry

56   guidelines and that should be adopted. SBC-Ameritech and the CLECs

57   also negotiated the content of the 836 LLN. None of the four additional

58   data fields identified by Mr. Reith in his testimony are recommended in the

59   Industry Guidelines or were agreed upon for inclusion during the

60   collaborative process.

61   The FCC merger conditions, as well as Condition 29 of this

62   Commission's Merger Order, provided that if SBC-Ameritech and the

63   CLECs could not reach agreement on an issue during the collaborative

64   process, any party could request arbitration of the dispute within a set

65   period of time. Neither Z-Tel nor any other CLEC sought arbitration on the

66   form or content of the 836 LLN.[1]

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[1]The disputed issues in Condition 29 were resolved by the Commission in the OSS Arbitration Docket, No. 00-0592. The form and content of the 836 LLN was not a disputed issue and was not considered in that docket. Issues arbitrated during the course of creating the Uniform and Enhanced OSS Plan of Record also were not related to line loss notifications.

67   Thus, Z-Tel's request to change the 836 LLN comes too late. It is

68   inconsistent with the Industry Guidelines and form of LLN collaboratively

69   negotiated between SBC-Ameritech and the CLECs. It conflicts with the

70   goal of uniformity in the FCC's and this Commission's Merger Orders. It

71   would undermine the work of industry forums that establish guidelines for

72   OSS and weaken the basis for future industry cooperation. For all these

73   reasons, Mr. Reith's proposal should not be considered.

74 Q. If Z-Tel desires changes to the 836 LLN format, is there a more

75   appropriate forum available for obtaining that relief?

76 A. Yes. Not only does Z-Tel's request come too late, but also, it is presented

77   in the wrong forum. The Commission recognized in Condition 29 of the

78   Merger Order that the OSS and OSS interfaces implemented through the

79   collaborative process would be subject to periodic update by industry

80   organizations that establish guidelines for OSS. If Z-Tel has concerns

81   about the content of the 836 LLN, Z-Tel should present those concerns

82   during the periodic reviews by the Ordering and Billing Forum (OBF),

83   which is the industry forum that establishes guidelines for the information

84   provided in EDI 836 transaction sets. Alternatively, Z-Tel could present its

85   request directly to SBC through the Change Management Process or the

86   CLEC User Forum, where all CLECs would have an opportunity to provide

87   input on the requested change.

88 Q. Are there any other reasons why the Commission should not consider Z-

89   Tel's request?

90 A.   Yes. Z-Tel did not request a revised format for the 836 LLN in its

91   complaint, and the Commission did not order Ameritech Illinois to modify

92   the format of the 836 LLN. I understand that Z-Tel did not request

93   rehearing on any portion of the Commission's Order. Therefore, the

94   Commission should not consider this issue for the first time in this

95   rehearing proceeding. Our lawyers will discuss in their briefs the legal

96   aspects of Z-Tel's request for relief.

97 Q.   Mr. Reith states (page 2, line 14) that additional information is required on

98   the LLN "in order to achieve parity in the provision of OSS information on

99   lost customers." Do you agree?

100 A.   No. Parity already exists in the provision of OSS information on lost

101   customers. Ameritech's retail business units currently receive their line

102   loss notifications exclusively through the 836 LLN, the same process used

103   to provide line loss notifications to Z-Tel and other CLECs. Schedule B

104   attached[2] is a copy of the EDI 836 Line Loss Notification Flow Description

105   that Ameritech Illinois provided to Z-Tel in response to its discovery

106   request. Schedule B describes the common process for providing LLNs to

107   CLECs and Ameritech retail. The LLN that Ameritech retail receives using

108   LSOG 5 contains only the two categories of information that Mr. Reith

109   describes.

110

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[2] Schedule A is attached to my direct testimony, Ameritech Illinois Ex. 3.0.

111 Q. Mr. Reith contends (page 7, line 18) that Ameritech's retail service

112   representatives have access to additional information because of their

113   ability to view Ameritech retail service orders in ASON. Does this indicate

114   a lack of parity in the provision of OSS information on lost customers?

115 A. No, it does not. What Mr. Reith fails to acknowledge is that Z-Tel also has

116   the ability to view service orders in ASON. Using the Order Status Inquiry

117   function of the enhanced Verigate system, which is accessed via the Web

118   Toolbar, Z-Tel may view ASON orders related to Z-Tel accounts just as

119   Ameritech retail service representatives can view Ameritech retail service

120   orders. Z-Tel uses Order Status Inquiry within enhanced Verigate

121   frequently to view its orders. In response to Z-Tel's discovery requests,

122   Ameritech Illinois provided copies of several orders, including a disconnect

123   ("D") order for a Z-Tel account, as they appear in ASON and the Verigate

124   system. Copies of the ASON and Verigate printouts of the D order are

125   attached as Schedule C. The order information provided is the same in

126   both formats.

127 Q. Citing Ameritech Illinois' response to Interrogatory 7, Mr. Reith (page 7,

128   line 20) also contends that when a customer migrates from Ameritech, the

129   information regarding that customer's account is sent to downstream

130   systems. Does this indicate a lack of parity?

131 A. No, it does not. As the response to Interrogatory 7 describes, ASON is an

132   order entry system at the "front end" of Ameritech's provisioning systems.

133   When a service order is entered in ASON to migrate a customer from

134   Ameritech retail to Z-Tel (or *vice versa*), the service order is distributed to

135   downstream systems involved in fulfilling the order, such as network

136   provisioning, billing, directory, 911, etc. The reason ASON distributes

137   orders to Ameritech's downstream systems and not to Z-Tel is that

138   Ameritech's network and systems are used to provide the

139   telecommunications services, and Z-Tel's are not. Ameritech must send

140   information to its systems so that they can determine what action to take

141   to fulfill the order. Sending the information to Z-Tel would serve no

142   purpose since Z-Tel's provisioning systems, to the extent it has any, are

143   not involved in providing the service.

144   Q.   If Z-Tel wanted to receive the same information from ASON that is

145   distributed to Ameritech's downstream systems, could it do so?

146   A.   Yes, I have already described the Verigate system that allows Z-Tel to

147   view (and copy) ASON orders. In addition, using the Order Status Inquiry

148   function of either an EDI or CORBA application-to-application interface, Z-

149   Tel could download every service order related to Z-Tel accounts and

150   store, format and use the information in any way it saw fit. I understand

151   that Z-Tel uses the CORBA interface.

152   Q.   Please discuss the six categories of information that Mr. Reith contends

153   should be included in the 836 LLN.

154   A.   The first two categories of information: the working telephone number of

155   the disconnected line[3] and the completion date of disconnect are

156   information that the industry guidelines recommend and that the industry

157   agreed should be included in the 836 LLN. These data fields are included

158   in LSOG 5 and all prior versions of the 836 LLN. These two categories of

159   information provide all of the information required by the losing carrier to

160   discontinue billing and update its records.

161   Mr. Reith's third category of requested information is the disconnect

162   reason code (DRC) shown on the order. The DRC is not information

163   required by the losing carrier in order to stop billing its customer and

164   update its records. Consequently, there is no reason for inclusion of this

165   information on the 836 LLN. If Z-Tel wishes to utilize the DRC for other

166   purposes, it may access it through the Order Status Inquiry functions I

167   discussed previously.

168   Mr. Reith's fourth category of requested information is the billing

169   telephone number, which may or may not be different than the telephone

170   number being disconnected. Mr. Reith states (page 10, line 18) "having

171   the billing telephone number will allow Z-Tel to verify when the customer

172   has multiple lines billed to the same account." Z-Tel necessarily

173   designates the billing telephone number for its customer accounts in its

174   own billing system and knows when multiple lines are billed to the same

175   account. Otherwise, Z-Tel could not bill its customers. Therefore, Z-Tel

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[3] Where there is no telephone number associated with the line, the circuit ID is provided instead.

176   already has the requested information. The 836 LLN is not a tool for

177   verifying the accuracy of Z-Tel's billing system, and it was never intended

178   as such.

179   Z-Tel's fifth requested category of information is the order number.

180   The order number appeared on earlier versions of the 836 LLN, including

181   Version 1, Issue 7. The CLECs agreed that they did not need it, and it

182   was eliminated on LSOG 4 and LSOG 5. Mr. Reith states (page 10, line

183   15), "the order number would have helped Z-Tel investigate the 'N Order'

184   problem described in my earlier testimony." Mr. Reith apparently has an

185   unreliable memory. At the time of the "N Order" problem he describes, the

186   836 LLN that Z-Tel was receiving under Version 1, Issue 7 included the

187   order number. In fact, it was the inclusion of the order number on the 836

188   LLN that caused the problem. As stated by Mr. Reith, "The Line Loss

189   Notices contained not just telephone numbers ("ANIs") that were coded as

190   "D" or disconnect, but also contained ANIs with N (new), S (suspend), and

191   C (change) codes." Z-Tel Ex. 1.0, p. 9. The problem was that a customer

192   migration might require the creation of multiple types of orders, and the

193   LLN often listed an order number other than the disconnect order. The

194   LLN was still valid. However, because it listed an N, S or C order, Z-Tel

195   did not process it as a line loss. See Ameritech Illinois Ex. 1.0, Schedule

196   D, Issue 4(e); Tr. 177-183. If the order number had not been included in

197   the LLN, this problem would not have arisen. Furthermore, should Z-Tel

198   wish to view the orders associated with any disconnect activity, the order

199   numbers can be obtained from Order Status Inquiry using the lost

200   telephone number as a search criteria. All orders associated with that

201   telephone number will be displayed and may be viewed with appropriate

202   authorization.

203   Mr. Reith's last requested category of information is the contact

204   name of a person at Ameritech that Z-Tel should contact in the event of an

205   error in the disconnect report. The right person to contact will vary

206   depending upon the nature of the issue and cannot be determined in

207   advance. That is why Ameritech designates its Account Manager as the

208   person who Z-Tel may contact for any issue. Z-Tel is well acquainted with

209   its Account Manager, knows her telephone number, email address and

210   postal address, and contacts her often. Including her name on every 836

211   LLN would add another line to the LLN, but it would serve no other

212   purpose.

213   Q.   At page 4, line 14 of his testimony, Mr. Reith states, "up until about June

214   2000, Ameritech provided its own retail group with the 836 LLN, and

215   included on that report the name of the carrier to whom an Ameritech

216   customer migrated." Is that statement accurate?

217   A.   No, Mr. Reith is mischaracterizing the record evidence. While the 836

218   LLN used prior to June 2000 contained a field that could be used to

219   identify the winning carrier, it was intended to be populated with a fixed

220   code that did not identify any carrier. When SBC acquired Ameritech, its

221   attorneys were concerned that the field might be populated in error with

222   the identity of the winning carrier, but there was no evidence that it had

223   ever occurred. As explained by Mr. Sirles:

224   The format of the Issue 7 line loss notification contains a
225   field that could identify the winning CLEC. And although it's
226   intended to be populated with a fixed code that does not identify the
227   winning CLEC, there was a concern that that process might fail at
228   some point.
229   There was also a concern about the overall perception of
230   receiving information from the wholesale system, some hand off of
231   wholesale data over to retail. The decision was made to simply
232   stop the process, and rely on different data sources within the
233   company to provide information to retail.
234
235   Tr. 36. Mr. Sirles testified (Tr. 137-140, 271) that SBC Ameritech has no

236   knowledge that the winning carrier field on the LLN was ever populated

237   with the identity of the winning carrier.

238   Q.   In talking about the disconnect reason code (DRC) appearing on the Local

239   Loss Report, Mr. Reith states (page 10, line 24), "I presume that

240   Ameritech uses this information (the disconnect reason code) to market its

241   former customers." Is Mr. Reith's presumption correct?

242   A.   No. The program that creates the Local Loss Report sorts the universe of

243   disconnect orders based upon the DRC shown on the order. It is my

244   understanding that the DRC was used to exclude orders passed to the

245   database but was not used for any purpose once data was passed to the

246   database. Ameritech considers the DRC to be carrier confidential

247   information, and Ameritech's retail operations have never been permitted

248   to use that information for marketing purposes. This is illustrated on the

249   AIT Change Request that Z-Tel introduced at the original hearing as Z-Tel

250   Cross Ex. 3. As stated in that document, "Any reporting or prospecting

251   done against this database must not include any reference to disconnect

252   reason code."

253 Q. If Ameritech considers the DRC to be carrier confidential information, why

254   is it included on the Local Loss Report made available to CLECs?

255 A. The DRC appeared on the Local Loss Report formerly provided to

256   Ameritech retail even though Ameritech retail did not use it. Ameritech

257   Illinois was ordered by the Commission to provide the same report to the

258   CLECs, and Ameritech Illinois complied with that Order. Ameritech

259   assumes the CLECs will make their own determinations whether and how

260   the information may be used.

261 Q. On page 9 of his testimony, Mr. Reith discusses the line loss information

262   that SBC provides in its PacBell and Southwestern Bell Telephone

263   Company territories. Please comment.

264 A. The industry standard form of line loss notification throughout SBC's 13-

265   state region, including Southwestern Bell and PacBell, is the 836 LLN

266   about which Z-Tel now complains. The CLECs in the Southwestern Bell

267   and PacBell regions expressed a preference during the collaborative

268   process for the 836 LLN over the existing method of line loss notification

269   (which is what Mr. Reith describes), and the LSOG 5 version of the 836

270   LLN was implemented in those regions as part of the Uniform and

271   Enhanced OSS Plan of Record. While CLECs still have a need for the

272   older methods of line loss notification in those regions until all CLECs

273   have migrated to LSOG 5, it is expected that those methods will be

274   phased out over time, just as prior versions of the 836 LLN have been

275   phased out in the Ameritech region.

276   Q.   Mr. Reith states (page 6, line 16) that Ameritech indicated in June that it

277   would not include partial migration losses in the Local Loss Report or

278   devote resources to ensure the accuracy of the reports. Please explain.

279   A.   First of all, subject to the limitations I described in my direct testimony, the

280   Local Loss Report is accurate. With respect to the suggestion that

281   Ameritech redesign the report, I would point out that the Commission's

282   May 8th Order directed Ameritech Illinois to make available to Z-Tel the

283   same line loss information it had been providing to Ameritech retail. That

284   is what Z-Tel demanded in its Verified Complaint, and that is what

285   Ameritech has provided. The limitations in the Local Loss Report that Mr.

286   Reith mentions were present in the report when it was received by

287   Ameritech retail.

288   Ameritech has no plans to expend resources to redesign the Local

289   Loss Report because it is not the agreed upon industry standard for

290   providing line loss notifications, and Z-Tel has access to the information

291   from other sources.

292

292   <u>Response to Testimony of Staff</u>

293   Q.   Staff witness Nancy Weber states (page 2, line 32) that she does not

294   entirely agree with Ameritech Illinois' position in its Application for

295   Rehearing that the Local Loss Report is redundant to the 836 LLN

296   because the Local Loss Report contains additional fields of information not

297   found on the 836 LLN. How do you respond?

298   A.   I agree that the Local Loss Report provides additional fields of information

299   not included on the 836 LLN and is not exclusively redundant to the 836

300   LLN. However, the Local Loss Report is redundant to the purpose of the

301   836 LLN, which is the form of line loss notification agreed upon by the

302   industry, and we do not believe that the CLECs will find that the Local

303   Loss Report adds value to their operations.

304   Q.   Ms. Weber states (page 4, line 69) that Ameritech Illinois should not be

305   permitted to stop providing the Local Loss Report to the CLECs just

306   because Ameritech retail no longer uses it. Please comment.

307   A.   Perhaps Ameritech Illinois' position was not as clear on this point as it

308   should have been. Ameritech Illinois is not asking to eliminate the

309   requirement to provide the Local Loss Report because Ameritech retail is

310   no longer using it. Rather, Ameritech Illinois is asking to eliminate the

311   requirement because we do not perceive the Local Loss Report to provide

312   any added value for the CLECs when compared to the 836 LLN and other

313   information available to them from Ameritech or in their own systems.

314   Q.   Ms. Weber states (page 4, line 87) that complete parity in line loss

315   notifications between Ameritech retail and CLECs does not exist because

316   Ameritech retail does not rely upon the 836 LLN to discontinue billing a

317   lost customer. Do you agree with this assessment?

318   A.   No, I do not. Ms. Weber is restating a position she took in the initial

319   hearing in this docket. Although she is not recommending that Ameritech

320   Illinois be required to modify its OSS to rely upon the 836 LLN to stop

321   billing, just as she did not make that recommendation in the initial

322   hearing,[4] I believe her premise is incorrect. Complete parity between

323   Ameritech retail and the CLECs does exist because LLNs are provided

324   through the 836 LLN process, which operates exactly the same for all

325   providers. I agree that Ameritech retail and the CLECs do not rely upon

326   the 836 LLN for all the same purposes, but that does not change the fact

327   that the process used and the LLNs received are at parity.

328   I would also note that in its Report to the Commission filed August

329   2, 2002, Staff stated "Accordingly, recognizing the Company's verified

330   statements [that Ameritech retail now relied exclusively on the 836 LLN

331   and that the Local Loss Report had been made available to the CLECs]

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[4] Information from ASON service orders is distributed to the billing systems to establish the proper billing whether Ameritech is billing a CLEC or a retail customer. For example, when Z-Tel migrates a customer away from Ameritech, ASON order information is distributed to the billing systems both to stop Ameritech's billing of the retail customer and to initiate wholesale billing to Z-Tel (or the reverse if Ameritech wins back the customer from Z-Tel). Prohibiting Ameritech from sending order information directly from ASON to the billing system to stop only Ameritech's billing of its retail customer and only in the situation where the line is lost to a competitor would destroy the integrity and efficiency of Ameritech's provisioning systems and require a fundamental redesign of those systems.

332   Staff believes that Ameritech has complied with the parity requirements of

333   the Final Order."

334   Q.   Does this conclude your rebuttal testimony?

335   A.   Yes.

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Z-TEL COMMUNICATIONS, INC.,   }
                                      }

           Complainant,   }
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         vs.   }   Docket No. 02-0160
                                      }

ILLINOIS BELL TELEPHONE COMPANY, }
d/b/a AMERITECH ILLINOIS,   }
                                      }

          Respondent.   }

Schedule B

To Rebuttal Testimony on Rehearing of

Beth Lawson

Ameritech Illinois Exhibit 4.0

EDI 836 LINE LOSS NOTIFICATION FLOW DESCRIPTION

EDI 836 Line Loss Notification Flow Description

Request:

Describe with particularity the process by which Ameritech identifies for its retail operations, including winback and for Z-Tel when an Ameritech retail or Z-Tel customer switches to alternative local exchange carrier, including the identification of all information that is provided, as well as when that information is provided.

Response:

The 836 LLN process is used to provide line loss notifications to Ameritech retail, Z-Tel and all other CLECs. Ameritech has been set up to look like any other CLEC in the 836 LLN process and receives its LLNs in the same manner using the same systems and in the same time frame as any other CLEC using the same LSOR version. The systems used to generate 836 LLNs vary depending upon the LSOR version that the winning carrier and the losing carrier have chosen to use. Ameritech retail has chosen to be set up to use LSOR 5. Z-Tel has chosen to be set up to use LSOR 4.

The service orders to migrate a customer from Ameritech retail or Z-Tel to another local exchange provider are initiated in the ASON system. When all the applicable service orders are marked as completed in ASON, the order information is passed to the Local Access Service Request system (LASR) and/or the Mechanized Order Receipt system (MOR) (see table below for specifics). The trigger for the creation of an EDI 836 LLN transaction is identical regardless of what LSOR version the winning and losing carrier are using and is based on the following criteria:

1. Complete Migrations
   - All applicable service orders in "completion status"
   - The submitting carrier ACNA (winning CLEC) is different than the current owner ACNA of the account (losing CLEC)

2. Partial Migrations
   - All applicable service orders in "completion status"
   - The submitting carrier ACNA (winning CLEC) is different than the current owner ACNA of the account (losing CLEC)

The EDI 836 LLN transaction contains the following data elements:

Field Name	Description	Additional Comments
LSOR 5 Format		
CVD	Conversion Date	8 numeric characters - Detail
Date Sent	Transaction Date Sent	8 numeric characters – Header
ECCKT	Exchange Company Circuit Number ID	41 alpha/numeric characters - Detail

Transaction Set Purpose	Transaction Set Purpose	2 numeric characters – Header (defaulted – always '47')
WTN	Working Telephone Number Lost	10 numeric characters - Detail
LSOR 4 Format		
Contract Status	Contract Status	2 alpha characters – Header (defaulted – always 'TR')
CVD	Conversion Date	8 numeric characters - Detail
Date Sent	Transaction Date Sent	8 numeric characters – Header
ECCKT	Exchange Company Circuit Number Lost	41 alpha/numeric characters - Detail
Transaction Set Purpose	Transaction Set Purpose	2 numeric characters – Header (defaulted – always '47')
WTN	Working Telephone Number Lost	10 numeric characters - Detail

The table below details the subsequent flow of LASR and/or MOR to the VAN (Value Added Network provider) depending on the version the "winning" CLEC and "losing" CLEC are on. The processing time for a LLN from the triggering event ("completion status") until delivery of the LLN to the VAN varies by no more than a few minutes, depending upon what combination of LSOR versions the winning and losing carrier are on.

	LSR submitted by Winning CLEC via LSOR4	**LSR submitted by Winning CLEC via LSOR5**
Losing CLEC receives 836 in LSOR4 (e.g., ZTEL)	MOR creates the 836 in LSOR4 format, MOR passes the 836 to the SBC translator, SBC translator sends the 836 to the appropriate VAN	LASR creates the 836 in LSOR4 format, LASR passes the 836 to the SBC translator, SBC translator sends the 836 to the appropriate VAN
Losing CLEC receives 836 in LSOR5 (e.g., AIT)	MOR passes information to LASR, LASR creates the 836 in LSOR5 format, LASR passes the 836 to SBC translator, SBC translator sends the 836 to the appropriate VAN	LASR creates the 836 in LSOR5 format, LASR passes the 836 to the SBC translator, SBC translator sends the 836 to the appropriate VAN

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                                               }
ILLINOIS BELL TELEPHONE COMPANY,   }
d/b/a AMERITECH ILLINOIS,   }
                                               }
            Respondent.   }

Schedule C

To Rebuttal Testimony on Rehearing of

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Ameritech Illinois Exhibit 4.0

Z-TEL "D" ORDER IN ASON AND VERIGATE FORMATS

CMD: IL

                 ** ASON COMMANDS **   :
                                                             :
     GEN _   RET _   INQ ON_   DEL _____   :
                                                             :
     NPA ___   TEL NUMBER ___ ____   CUS CODE ___   :
                                                             :
     CLS SVC _____   ORDER TYPE CODE __   :
                                                             :
     ORDER NUMBER D0835749553   :
                                                             :
     CIRCUIT ID _____   :
                                                             :
     CKL ____ ____ _____ ____ ____ ____ ____ _____   :
                                                             :
     INQ KEY _____   :
                                                             :
ENTER X FOR ADDITIONAL SCREENS TO OBTAIN   :
SELECTED MINIMAL INPUT FROM CUSTOMER'S ACCOUNT: :
   LISTINGS: _   HUNTING OR CE INFO: _   :
   TELEPHONE NUMBERS: _   SERIAL CALLING CARDS: _   :
   OR SLA/DPA INFO   :

```
I9999 ICARE IPND1 IDISC IRSL3 IROS1  2P    PG 001
TN 847 854-2234    CUS 361 CD            EX ALGN
ORD D0835749553 :              CS PU7    SLS DM3789Z
APP 07-10-02 DD 07-15-02    X            DC
```

```
                                                    ***
SLSS  IRWXDNM                                      *     *
SEQ   N0835749588                                  *  I  *
RO    N0835749588                                  *  N  *
RRSO  N0835749588                                  *  Q  *
OZBU  II, CPO-WUA                                  *  U  *
OPCL  ULS PROPRIETARY                              *  I  *
OLRS  NA                                           *  R  *
OZULSWUA                                           *  Y  *
ONOCN7229                                          *     *
AECN  ELZ                                           ***
ACIS
```

```
I9999 ICARE IPND1 IDISC IRSL3 IROS1  2P    PG 001
TN 847 854-2234    CUS 361 CD           EX ALGN
ORD D0835749553 :              CS PU7   SLS DM3789Z
APP 07-10-02 DD 07-15-02    X           DC
```

```
---LIST                                              ***
OLN  BHATT, PRASAD                                 *    *
OLA  1300 INDUSTRIAL DR, LK IN HILS                * I *
OSA  1300 INDUSTRIAL DR, LK IN HILS                * N *
OLOC UNIT D                                         * Q *
ODZIP60102                                          * U *
                                                    * I *
---BILL                                             * R *
IDCR CO                                             * Y *
OBN1 REFER 2 RBS 4 PORT BILLNG                     *    *
OBA1 350 N. ORLEANS                                 ***
OPO  CHICAGO IL 60654
OTAR 0003
IPON MCP0000000108155
```

```
I9999 ICARE IPND1 IDISC IRSL3 IROS1  2P   PG 002
TN 847 854-2234    CUS 361 CD           EX ALGN
ORD D0835749553 :              CS PU7    SLS DM3789Z
APP 07-10-02 DD 07-15-02    X            DC
```

```
---S&E                                                  ***
01    TTR                                             *     *
01    UJR/PIC LGT/PICX 0432                           * I *
      /PCA BO, 06-19-02/ZPIC LGT                      * N *
      /LPIC 0432/LPCA BO, 06-19-02                    * Q *
      /ADL/NC SNAL/LSO 847 658                        * U *
      /TRAK REBLND/XPOI ALGNILAQ                      * I *
      /NCI 02LS2/DES CPO/RUF 1                        * R *
01    UXTCR                                           * Y *
01    CXC9X                                           *     *
01    NSR                                              ***
01    TGROH
01    TGRTA
```

```
I9999 ICARE IPND1 IDISC IRSL3 IROS1  2P   PG 002
TN 847 854-2234   CUS 361 CD          EX ALGN
ORD D0835749553 :            CS PU7   SLS DM3789Z
APP 07-10-02 DD 07-15-02    X            DC
```

```
---RMKS                                              ***
IRMK OMIT NRCS                                      *   *
     CLEC TO CLEC ASSUME                            * I *
                                                    * N *
---ASGM                                             * Q *
RCSO C0835R749553                                   * U *
G1    TN 847 854-2234                               * I *
FA    1300 INDUSTRIAL DR, LK IN HILS                * R *
      /LOC UNIT D/RT 5226/RZ 13                     * Y *
OOE   10020-2-04-07/EXK 847 658/TN                  *   *
      847 854-2234/LPS/DF F10-02-                    ***
      012B
G2    WC 847 658
```

```
I9999 ICARE IPND1 IDISC IRSL3 IROS1  2P    PG 003 L
TN 847 854-2234    CUS 361 CD            EX ALGN
ORD D0835749553 :              CS PU7    SLS DM3789Z
APP 07-10-02 DD 07-15-02    X             DC
```

```
OF1   /CA 2/PR 1780/DF F10-03-038V
      /PRQ Y/BP 580/OBP 158/TEA SAI
      10 PYOTT RD-H; EXJ/TPR 522003
OF2   /CA 10P/PR 158/BP 8/TEA RW
      1300 INDUSTRIAL DR; CDW
```

```
                                              ***
                                            *     *
                                            * I *
                                            * N *
                                            * Q *
                                            * U *
                                            * I *
                                            * R *
                                            * Y *
                                            *     *
                                              ***
```

Service Order List

File Edit View Favorites Tools Help

Back | Forward | Stop | Refresh | Home | Search | Favorites | History | Mail | Size | Print | Edit

Links | Address | 0835749553NPA=&NXX=&LINE=&PON=&ECCKT=&bt_cc=&hdn_txtyp=P&Detail=P&session1=null&SCSIZE=12&btn=Input&ServiceLength=13&List_SC1=25&object%50&FILTER=N

Verigate   *Order Status Service Order List*

Service Center (SC1)	Service Order Type (SOTYP)	Purchase Order Number (PON)	Working /Account Telephone Number (WTN/ATN)	Service Order Number (SON)	Order Status Code (SOSTATCD)	Order States Category (SOSTATCAT)	Service Order Due Date (SODD)	Service Order Completed Date (SOCD)	Service Order Posted Date (SOPDT)
IL	PENDING	MCP0000000108155	847-854-2234	D0835749553	2P	Pending	20020715		

Number of Rows = 1

View Details | Refresh | Filter

TXNUM:rt694048196676P   D/T Sent:200207120257PM

File Edit View Favorites Tools Help

Back | Forward | Stop | Refresh | Home | Search | Favorites | History | Mail | Size | Print | Edit

Links | Address | sbc.com/tbapps/VerigateServlet?hdn_txtyp=P&List_SC1=CA&Detail=X&session1=null&SOURCE=FromAuthorization&SON=D0835749553&svcCenter=IL&CC=&REGION=&AGAUTH=Y

Verigate   *Order Status Service Order Detail*

Letter of Authorization on File?(AGAUTH): Yes

Service Order Number(SON): D0835749553   Service Order Suffix(SOSFX):
Working/Account Telephone Number (WTN/ATN): 847-854-2234   Customer Code(CUSCODE): 361
Company Code 2(CC2): 3259   Class of Service(CS): PU7
Application Date(APPLDT): 20020710   Service Order Issued Date(SOISSDT): 20020710
Service Order Due Date(SODD): 20020715   Service Order Subsequent Due Date (SOSDD): 20020715
Service Order Completed Date(SOCD):   Service Order Status Code(SOSTATCD): 2P
Service Order Posted Date(SOPDT):   Service Order Status Category (SOSTATCAT): Pending
Typist ID(TYPID): DM37892   Service Order Status Description (SOSTATDES): Order pending in ACIS and assigned

Service Order Detail(SODETAIL): SLSS IRWXDNM
SEQ N0835749588
RO N0835749588
RRSO N0835749588
OZBU II, CPO-WUA
OPCL ULS PROPRIETARY
OLRS NA
OZULSWUA
ONOCN7229
AECN ELZ
ACIS
---LIST
OLN BHATT, PRASAD
OLA 1300 INDUSTRIAL DR, LK IN
HILS
OSA 1300 INDUSTRIAL DR, LK IN
HILS
OLOC UNIT D
ODZIP60102

Service Order Detail
Service Order Detail (Continued)

---BILL
IDCR CO
OBN1 REFER 2 RBS 4 PORT BILLNG

OBA1 350 N. ORLEANS
OPD CHICAGO IL 60654
OTAR 0003
IPON MCP00000000108155
---S&E
01 TTR
01 UJR/PIC LGT/PICX 0432
/PCA BO, 06-19-02/ZPIC LGT
/LPIC 0432/LPCA BO, 06-19-02
/ADL/NC SNAL/LSO 847 658
/TRAK REBLND/XPOI ALGNILAQ
/NCI 02LS2/DES CPO/RUF 1
01 UXTCR
01 CXC9X
01 NSR
01 TGROH
01 TGRTA
---RMKS
IRMK OMIT NRCS
CLEC TO CLEC ASSUME
---ASGM
RCSO C0835R749553
G1 TN 847 854-2234
FA 1300 INDUSTRIAL DR, LK IN
HILS
/LOC UNIT D/RT 5226/R2 13
OOE 10020-2-04-07/EXK 847
658/TN
847 854-2234/LPS/DF F10-02-
012B
G2 WC 847 658
OF1 /CA 2/PR 1780/DF F10-03-
038V
/PRQ Y/BP 580/OBP 158/TEA
SAI
1D PYOTT RD-H; EXJ/TPR 522003
OF2 /CA 10P/PR 158/BP 8/TEA
RW
1300 INDUSTRIAL DR; CDW